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*Attorneys for Nobuaki Kobayashi,
Bankruptcy Trustee and Foreign Representative
of MtGox Co., Ltd., a/k/a MtGox KK*

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re)
MtGox Co., Ltd. (a/k/a MtGox KK)) Chapter 15
Debtor in a Foreign Proceeding.) Case No. 14-31229-sgj15

**BAKER & MCKENZIE LLP'S MOTION TO WITHDRAW AS COUNSEL
TO THE FOREIGN REPRESENTATIVE**

Baker & McKenzie LLP (“B&M”) hereby files this motion (the “Motion”) to withdraw as counsel to Nobuaki Kobayashi (the “Foreign Representative”), in his capacity as Bankruptcy

Trustee and Foreign Representative of MtGox Co., Ltd., a/k/a MtGox KK (the “Debtor”), seeking entry of an order, substantially in the form attached hereto as Exhibit A. In support of the Motion, B&M respectfully states as follows:

1. This Motion is unopposed.
2. By this Motion, B&M seeks entry of an order authorizing B&M to withdraw as counsel to the Foreign Representative in this chapter 15 case.
3. The Foreign Representative will continue to be represented in this chapter 15 case by the attorneys whose names are set forth below:

David J. Molton
Daniel J. Saval
BROWN RUDNICK LLP
Seven Times Square
New York, NY 10036
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4. Each of the foregoing attorneys has filed a notice of appearance in this chapter 15 case on behalf of the Foreign Representative. *See* Dkt. Nos. 102, 103, 104, 105.

5. This Motion is based on good cause that following the transition of the Debtor’s foreign proceeding in the Twentieth Civil Division of the Tokyo District Court, Japan, from a civil rehabilitation proceeding to a bankruptcy proceeding, Mr. Kobayashi was appointed as the Debtor’s Foreign Representative, replacing Mr. Robert Marie Mark Karpeles.

6. No party will be prejudiced by the relief sought in this Motion.

7. Approval of B&M’s withdrawal as counsel to the Foreign Representative is not sought for delay but so that justice may be done.

Prayer

WHEREFORE, Baker & McKenzie LLP respectfully requests that the Court grant this Motion and enter an order substantially in the form attached hereto as Exhibit A, authorizing withdrawal of Baker & McKenzie LLP as counsel to the Foreign Representative and granting such other and further relief as the Court deems proper.

Dated: May 2, 2014
Dallas, Texas

Respectfully submitted,

BAKER & MCKENZIE LLP

By: /s/ David W. Parham
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*Attorneys for Nobuaki Kobayashi,
Bankruptcy Trustee and Foreign
Representative of MtGox Co., Ltd., a/k/a
MtGox KK*

CERTIFICATE OF SERVICE

This is to certify that on May 2, 2014, a copy of the foregoing document was served on the parties registered to receive electronic notification via the Electronic Case Filing System for the United States Bankruptcy Court for the Northern District of Texas, and via United States first class mail, postage pre-paid to the parties listed below:

Alicia E. Hwang Edelson PC 350 North LaSalle St., Suite 1300 Chicago, IL 60654	Barry C. Barnett Susman Godfrey L.L.P. 901 Main St., Suite 5100 Dallas, TX 75202	Christopher L. Door Edelson PC 350 North LaSalle St., Suite 1300 Chicago, IL 60654
Edgar Sargent Susman Godfrey LLP 1201 3rd Avenue, Suite 3800 Seattle, WA 98101-3087	G. Larry Engel, Vincent J. Novak, and Kristin A. Hiensch Morrison & Foerster LLP 425 Market Street San Francisco, CA 94105-2383	Jay Edelson Edelson PC 350 North LaSalle St., Suite 1300 Chicago, IL 60654
Josephine Garrett Josephine Garrett, P.C. 3119 West 5th Street Fort Worth, TX 76107	Lisa L. Lambert U.S. Trustee Office of the U.S. Trustee 1100 Commerce Street Dallas, TX 75242	Mark Karpeles 6-28-3302, Aobadai 3-chome, Meguro-ku Tokyo, Japan
Megan Lindsey Edelson PC 999 West 18th St., Suite 3000 Denver, CO 80202	MtGox, Co. Ltd. a/k/a MtGox KK 11-5, Shibuya 2-chome, Shibuya-ku Tokyo, Japan	Robin E. Phelan Haynes and Boone, LLP 2323 Victory Avenue, Suite 700 Dallas, TX 75219
Roger M. Townsend Breskin Johnson & Townsend PLLC 1000 2nd Ave., Suite 3670 Seattle, WA 98104	Scott B. Kitei Honigman Miller Schwarts and Cohn LLP 2290 First National Bldg. 660 Woodward Ave.	Stephen Manz Haynes and Boone, LLP 2323 Victory Avenue, Suite 700 Dallas, TX 75219
Steven L. Woodrow Edelson PC 350 North LaSalle St., Suite 1300 Chicago, IL 60654	The Honorable Jeh Johnson Secretary of Homeland Security Department of Homeland Security Washington, DC 20528	David J. Molton Brown Rudnick LLP Seven Times Square New York, NY 10036 Telephone: 212-209-4905
Marcus A. Helt Gardere Wynn Sewell LLP 1601 Elm Street, Suite 3000 Dallas, Texas 75201	Thomas Scannell Gardere Wynn Sewell LLP 1601 Elm Street, Suite 3000 Dallas, Texas 75201	Daniel J. Saval Brown Rudnick LLP Seven Times Square New York, NY 10036

/s/ David W. Parham
David W. Parham

Exhibit A

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re)
) Chapter 15
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MtGox Co., Ltd. (a/k/a MtGox KK)) Case No. 14-31229-sgj15
)
Debtor in a Foreign Proceeding.)
)

**ORDER GRANTING BAKER & MCKENZIE LLP'S MOTION TO WITHDRAW
AS COUNSEL TO THE FOREIGN REPRESENTATIVE**

Upon the motion of Baker & McKenzie LLP, seeking authorization to withdraw as counsel to the Foreign Representative¹ [Dkt. No. ____]; and the Court having determined that the relief requested in the Motion is in the best interests of the Debtor, its estate, its creditors, and other parties in interest; and it appearing that proper and adequate notice of the Motion has been given and that no other or further notice is necessary; and upon the record herein; and after due deliberation thereon; and good and sufficient cause appearing therefor, it is hereby:

¹ Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Motion.

ORDERED, ADJUDGED AND DECREED that:

1. The Motion is GRANTED.
2. Baker & McKenzie LLP is hereby withdrawn as counsel to the Foreign Representative.
3. The Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation of this Order.

END OF ORDER # #

Prepared and submitted by:

BAKER & MCKENZIE LLP

/s/ David W. Parham

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State Bar No. 15459500

John Mitchell

State Bar No. 24056313

Rosa A. Shirley

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